

## REMARKS

Claims 5-10 have been rejected under 35 U.S.C. 103(a) as being unpatentable over *Swanson* (US Pub. 20020141549A1) in view of *Glatzer* (US Pub. 20050078090A1). Applicant respectfully traverses the rejection.

In response to the previously filed amendment, Applicants respond below accordingly.

### (1) The term "Function"

The focus of the argument centers around the generation of the help information (audio and/or visual response) in response to the processing of a partially executed function (the function being, for example turning on a speaker on the mobile device). The Examiner cites *Swanson* as disclosing a function-- and states that the word operation is almost a synonym for function and at least a related word. In this context, The Examiner asserts that pressing a button (e.g. to turn on the speaker) is not a function, but the device checking if a button is pressed is a function. Assuming *arguendo* that the term is defined in this way, the claimed invention requires a partially executed function (the function is not completed at this time). In *Swanson*, on the other hand, the function (checking if the button was pressed) is completed in its entirety, not partially executed. Moreover, it is the pressing of the button that represents the function itself, not the checking of whether the button was pressed.

### (2) The term "Help Information"

The Examiner cites *Glatzer* as providing a visual response as help information (e.g. illuminating a button). However, the visual response in *Glatzer* is, for example, to train a user how to play a video game (paragraph [0029]) or allow an illiterate person to use the device (paragraph [0019]). The illuminated buttons are pre-set to highlighted keys for a given application for usability improvement (paragraph [0039]). The illumination is not in response to a request for help by the user, and therefore is not "help information." To clarify this point, claim 1 has been amended to require that processing of the help signal is "in response to a request for help." For example, help information is provided for a mobile device without using the screen upon which an application is being executed. That is, if a user requests help, the device uses audio (e.g. voice) and visual (e.g. buttons light up) indications as opposed to text on the screen.

(3) Obviousness

The Examiner notes that the combination of references is proper since in the instant case “the primary reference is directed to a method to explain and indicate features of a device to a user (see title) and the secondary reference is directed to a method to indicate available input and options of a device to a user. Since both [sic] references are directed to help the user to operated the device it would have been obvious...to combine the teachings to prevent invalid input and user frustration.” Applicants respectfully disagree.

As explained in the previously filed response, Swanson uses an audio indication to convey help information, whereas Glatzer uses a visual indication to highlight pre-set input means. There is no reason, for example, why a visual indication would be used in Swanson since the “online help” feature occurs over a telephone. The clear intention here is to provide help through audio information by pressing a “?” symbol. There is only a single button to select to initiate the help information. Glatzer, on the other hand, uses a visual indication in order to improve usability of the device—i.e. in order to better train a user or illiterate person. A combination of the references simply does not make sense. A visual indication on the telephone in Swanson would not provide any “usability improvement” as the audio indication provides all necessary help.

Claims 7 and 10 have been rejected under 35 U.S.C. 103(a) as being unpatentable over *Swanson* (US Pub. 20020141549A1) in view of *Glatzer* (US Pub. 20050078090A1), further in view of *Hull* (US Pub. 20006720863B2). Applicant respectfully traverses the rejection for at least the same reasons provided in the arguments above.

In light of the above, Applicants respectfully submit that claims 5-10 are in condition for allowance, which is respectfully requested. Applicants earnestly request an early Notice of Allowance. If any fees are due in connection with this application as a whole, the Examiner is authorized to deduct such fees from deposit account no. 02-1818.

If such a deduction is made, please indicate the attorney docket number (119065-021) on the account statement.

Respectfully submitted,

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